

18 August 2006
Reference: 0043035

Massachusetts Department of Environmental Protection
Northeast Region
205B Lowell Street
Wilmington, Massachusetts 01887

Re: Response to Public Comments
Draft Phase IV Remedy Implementation Plan
Former Raytheon Facility
430 Boston Post Road
Wayland, Massachusetts
RTN 3-22408; Tier IB Permit No. W045278

Dear Department Representative:

On behalf of Raytheon Company (Raytheon), Environmental Resources Management (ERM) has prepared this letter to provide responses to comments received during the public comment period for the Draft Phase IV Remedy Implementation Plan (Phase IV), dated 17 May 2006. CMG Environmental, Inc. (CMG), consultant to the Town of Wayland, submitted eight comments in a letter dated 22 June 2006, and Ms. Linda Segal submitted fifteen comments in a letter dated 22 June 2006. This response letter includes each comment in italics and responses in plain text.

CMG's Comments:

2.2 ADDITIONAL SITE ASSESSMENT ACTIVITIES

2.2.1 Soil

Results

D) On Page 8 of the draft RIP, ERM notes detection of the semi-volatile organic compound (SVOC) 2,4,5-trichlorophenol in a toxicity characteristic leaching procedure (TCLP) extract. Prior investigation of the Northern Area had not identified this compound as a contaminant of concern. Table 2 indicates that the TCLP extract was of soil sample SB-529 [10-15']. ERM did not request total SVOC analysis of this sample, but they did have soil sample SB-522 [10-15'] analyzed for total SVOCs via EPA Method 8270C. Figure 5 (Northern Area Soil Boring Results) indicates soil boring B-529 was the same location as membrane interface probe sampling point MIP-529, and is about 12 feet north of boring B-522.

It would be reasonable for ERM to assume that soil samples collected at a depth of 10-15 feet below grade so close together would be essentially identical (all other things being equal). However, since TCLP testing involves a 20-fold dilution of soil into pH-adjusted extraction water, the TCLP result of 28 µg/L implies a total 2,4,5-trichlorophenol concentration in soil sample SB-529 [10-15'] of at least 560 µg/Kg (0.56 mg/Kg), and likely significantly higher (since it is improbable that TCLP extraction would leach 100% of this SVOC out of the soil sample). Nonetheless, total SVOC analysis of soil sample SB-522 [10-15'] identified no 2,4,5-trichlorophenol above the laboratory reporting limit of 440 µg/Kg (0.44 mg/Kg).

The applicable (RCS-1) reportable concentration standard for 2,4,5-trichlorophenol is 3 mg/Kg. The Town of Wayland is concerned that there may be a reportable concentration of this SVOC present at depth in the chlorinated volatile organic compound (CVOC) release source area. Therefore, Wayland requests that Raytheon address this concern by analyzing future soil samples collected from the CVOC source area for SVOCs via EPA Method 8270C. The Town also requests Raytheon analyze groundwater in the CVOC source area for SVOCs via EPA Method 8270C.

At this time, Raytheon and ERM do not anticipate collecting additional soil samples from the Northern Area source area (Source Area) for laboratory analysis prior to initiating the Source Area removal as detailed in the Draft Phase IV. On 1 August 2006 ERM collected a groundwater sample from MW-552 representative of the treatment system influent during excavation dewatering activities as required by the United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System Remediation General Permit (RGP) required for the Source Area remediation. As a constituent of the SVOC suite analyzed for by EPA Method 8270, 2,4,5-trichlorophenol was not detected at or above the method detection limits. Since 2,4,5-trichlorophenol was not detected in groundwater, Raytheon and ERM do not believe that further soil sampling is necessary. Additionally, the soil in question will be removed as part of the Source Area remediation.

2.4 RELEVANT CONTACTS

II) *The list of contact persons tabulated on Page 12 of the draft RIP does not provide telephone numbers for the responsible party (RP) and Licensed Site Professional (LSP), as specifically required by DEP regulations set forth at 310 CMR 40.0874(3)(a). This table provides no contact person for Wayland Meadows Limited Partnership, owner of parcel 23-52D. In addition, this table*

does not identify "those persons who will own, operate and/or maintain the selected remedial action alternative during and following construction" as required by 310 CMR 40.0874(3)(a)3.

Wayland requests that Raytheon provide telephone numbers for Mr. Louis J. Burkhardt (for Raytheon, the RP) and Mr. John C. Drobinski (the LSP of record) in this table, and name a contact person for Wayland Meadows Limited Partnership. The Town also requests that Raytheon and ERM explicitly state who will own, operate, and maintain the proposed cofferdam structures, dewatering treatment facility, and remedial additive injection system discussed in Sections 4.0 and 5.0 of the draft RIP.

ERM has included complete contact information for Mr. Louis J. Burkhardt (Raytheon) and Mr. John C. Drobinski (LSP) in Section 2.4 of the Final Phase IV. The contact information for Mr. Robert Schelmerdeine, legal counsel for Wayland Meadows Limited Partnership, has been also been added to Section 2.4

The following text has been added to Section 4.2 of the Final Phase IV, "Raytheon will own the proposed cofferdam structures, dewatering treatment facility, and remedial additive injection system while ERM will operate and maintain these structures".

3.1 IMPACTED AREAS 3.1.2

Groundwater

III) *On Page 14 of the draft RIP, ERM notes detection of chloroform in well MW-556S in the September and October 2005 sampling rounds above the applicable (RCGW-1) reportable concentration standard, but not in later testing. ERM further states that Raytheon did not submit a release notification form to DEP to report this condition.*

The RCGW-1 reportable concentration standard for chloroform is 0.005 mg/L (5 µg/L). According to Table 8 of the December 16, 2005 Phase II - Comprehensive Site Assessment report for RTN 3-22408, testing identified 9.1 µg/L chloroform in the groundwater sample collected from well MW-556S on September 27, 2005 and 5.9 µg/L in the sample collected on October 28, 2005. Table 7 of the draft RIP report (Summary of Groundwater VOC Analytical Results) does not list chloroform; laboratory data sheets included electronically in Appendix C indicate that the sample collected from MW-556S on April 6, 2006 did not exhibit any chloroform above the laboratory reporting limit of 0.75 µg/L.

DEP regulations set forth at 310 CMR 40.0317(14) specify that reporting is not necessary if apparent reportable concentration exceedances are the result of sampling, analytical, or observational error(s), as established through additional sampling or preponderance of evidence. Since the October 2005 testing confirmed the RCGW-1 exceedance for chloroform in well MW556S identified by the September 2005 testing, Wayland does not believe that Raytheon can assert a notification exemption per 310 CMR 40.0317(14), regardless of the April 2006 results.

DEP provides another reporting exemption specific to chloroform at 310 CMR 40.0317(20) if the otherwise reportable condition is due to naturally-occurring ecological processes (or leakage/ discharge from a public water supply system). ERM does not provide any technical justification in the draft RIP for Raytheon to assert this particular notification exemption.

The Town requests that Raytheon either provide sufficient technical justification to assert the notification exemption set forth at 310 CMR 40.0317(20), or else provide DEP with a proper (if tardy) release notification for identification of chloroform in groundwater at well MW-556S in September 2005.

Since submittal of the Phase II, dated 16 December 2005, two groundwater samples were collected from MW-556S. The analytical results for one of these samples was inadvertently omitted from the Draft Phase IV. This data has been included in Table 7 of the Final Phase IV. A summary of the chloroform results from MW-556S is provided in the table below:

Location	Constituent	Date Sampled	Result (µg/L)
MW-556S	Chloroform	9/27/2005	9.1
MW-556S	Chloroform	10/28/2005	5.9
MW-556S	Chloroform	1/13/2006	ND
MW-556S	Chloroform	4/6/2006	ND

Also, ERM conducted a quarterly groundwater monitoring round in July 2006 which included an analysis of VOCs in MW-556S. As with the previous two sampling rounds, chloroform was not detected in the sample. This data has only recently been received by ERM and will not appear in the Final Phase IV document.

It is the opinion of Raytheon, ERM, and the LSP-of-record that the likely source of the chloroform in MW-556S was the drilling water used during

monitoring well installation and is not representative of groundwater conditions in this well. Since the detection of chloroform decreased from its initial detection and was not reproducible in subsequent groundwater sampling events, the detection is not considered reportable in accordance with 310 CMR 40.0317(14).

4.4 IMPLEMENTATION PROGRAM

4.4.3 Inspections and Monitoring

IV) This subsection of the draft RIP (see Page 25) asserts that Section 4.3 describes inspection and monitoring of the excavation. While Section 4.3 (Operation Parameters) does include a subsection on structural monitoring (4.3.2, Page 24), there is no information presented in Section 4.3 regarding excavation inspections.

The proposed cofferdam construction involves driving sheet piling and casting concrete walers to support the walls of the rather deep soil excavation. Such construction is not uncommon, but carries a substantial safety risk if not conducted properly. Therefore, Wayland requests that Raytheon provide "a general description of inspections... which will be performed to ensure adequate construction and performance" in conformance with 310 CMR 40.0874(3)(b)11.

The "excavation" inspections referred to in Section 4.4.3 of the Draft Phase IV are the same inspections of the structural integrity of the cofferdam cited in Section 4.3. The term "excavation" has been replaced with "cofferdam" in the Final Phase IV to minimize any future confusion.

Hartman Engineering will maintain the following oversight schedule during the cofferdam installation:

- Design Engineer: 3 days on site for orientation and start-up of cofferdam installation;
- Engineer: 3 days on site for driving the first set of piles;
- Technician: 3 days on site for excavation to upper waler to ensure rebar, gauges, form pour and initial reading are completed correctly;
- Technician: 3 days on site for excavation to lower waler to ensure rebar, gauges, form pour and initial reading are completed correctly; and
- The Design Engineer will also be available as needed through out the project.

5.3 DESIGN AND IMPLEMENTATION

5.3.1 Pre-Remedial Design Activities

V) *The inset to Figure 8 (Site Features and Proposed Work Areas) depicts both the location of proposed cofferdam structures and Northern Area sampling locations. These structures would encompass the following sampling points:*

East Cofferdam

- *Monitoring wells MW-262S, MW-262M & MW-262D*
- *Waterloo profiler locations WP-515, WP-520, WP-529, WP-530 & WP-534;*
- *Soil boring locations B-243, B-244, B-246, B-250, B-251, B-252, B-255, B-256, B-257, B-531B, B-534A, B-534B & B-522A; and*
- *Membrane interface probe locations MIP-515, MIP-516, MIP-518, MIP-519, MIP-520, MIP-521, MIP-522, MIP-524, MIP-525, MIP-530, MIP-531, MIP-532, MIP-533, MIP-534, MIP-535 & MIP-543.*

West Cofferdam (60-foot diameter)

- *Waterloo profiler locations B-241, B-242 & WP-515;*
- *Soil boring locations B-246, B-247, B-248, B-252, B-253, B-254, B-259 & B-260; and*
- *Membrane interface probe locations MIP-503, MIP-504, MIP-506, MIP-507, MIP-509, MIP-510, MIP-511, MIP-512, MIP-513, MIP-514, MIP-515, MIP-516, MIP-518, MIP-539 & MIP-543*

Monitoring well MW-261S appears to be located within 3 feet of proposed location of the west (60-foot) cofferdam, and well MW-552 appears to be within 7 feet of this proposed structure. Therefore, construction of the second (west) cofferdam would likely destroy both of these monitoring wells.

On page 29 of the draft RIP, ERM indicates that they indeed intend to use wells MW-261S and MW-552 (among others) to monitor bioremediation effectiveness. ERM also notes (below the table on the same page) that they may install additional monitoring wells to replace any destroyed by source area soil excavation.

The town requests that ERM and Raytheon provide a technical rationale for which monitoring wells would be replaced if destroyed by soil excavation. Furthermore, Wayland requests that at a minimum, Raytheon commits to placing monitoring wells in the excavation area after the soil with at least one well screened in the replacement fill saturated soil zone and one well screened from the bottom of excavation to 10 feet below it. The purpose of these wells would be to monitor for post-excavation contaminant rebound in the CVOC

source area.

As stated in Section 5.3.1 the Draft Phase IV, Raytheon and ERM plan to use the following monitoring wells to monitor bioremediation remedial activities:

- DEP-19M, MW-261S, MW-262S, MW-264M, MW-265M, MW-266Ma/Mb, MW-267S/M, MW-268M/D, MW-551, MW-552, MW-553.

Should any of these wells be damaged or destroyed during the excavation activities, ERM will reinstall a monitoring well in the same location. Also, Section 5.3.1 of the Final Phase IV has been amended to include the following statement: "The reinstalled monitoring well will meet the same design specifications as the monitoring well it is intended to replace."

ERM does not believe there is value in installing a monitoring well within the excavation area as requested by the Town of Wayland. It is ERM's opinion that monitoring wells MW-261S, MW-551, MW-552, and MW-553 are sufficient for monitoring the post-excavation groundwater quality downgradient of the excavation.

5.4.6 Required Permits

VI) *On Page 32 of the draft RIP, ERM notes that bioremediation activities will not require any DEP permit to complete pursuant to 310 CMR 40.0046. However, ERM does not here discuss whether injection of remedial additives within and proximate to a mapped area of bordering vegetative wetland would require approval from the Wayland Conservation Commission [cf. 310 CMR 40.0874(3)(f)].*

The Town requests that Raytheon provide a discussion of their plan to bring this matter before the Wayland Conservation Commission, and obtain proper approval for injection of remedial additives, if necessary.

Raytheon and ERM anticipate that bioremediation activities will not be conducted within the wetland resource area or buffer zone. If these plans change, and invasive activities are planned in the buffer zone, the appropriate application will be submitted to the Town of Wayland Conservation Commission at that time.

Appendix D (Design Calculations)

VII) Appendix D of the draft RIP does not contain any design calculations, merely an otherwise blank page that states "To be inserted in final report." This is an omission relative to DEP regulations set forth at 310 CMR 40.0874(3)(b)6.a.

Wayland requests an opportunity to review (and as appropriate, comment) on whatever design calculations Raytheon intends to place in Appendix D in the final Phase IV RIP in accordance with the time frames provided in the Site PIP Plan.

A copy of the final design calculations and drawings were provided to Ben Gould, CMG Environmental, on 26 June 2006. Mr. Gould's comments, dated 7 July 2006, stated he had no issues with the design calculations.

Appendix F (Spill Prevention Control and Countermeasures Plan)

VIII) The SPCC Plan included as Appendix F to the draft RIP is specific to remediation activities Raytheon previously carried out in the Southern and Western areas of the Site (RTN 3-13302, Tier IB Permit No. 133939) rather than the subject Northern Area remediation. This SPCC Plan does not discuss dewatering activities related to the proposed deep excavation in the Northern Area, nor the proposed remedial additive injection system proposed for this portion of the Site.

Wayland requests that Raytheon and ERM prepare an SPCC Plan that is specific to the remediation discussed in the Phase IV RIP for RTN 3-22408 (Tier IB Permit No. W045278) and meets the requirements set forth at 310 CMR 40.0874(3)(b)7.

Raytheon and ERM have prepared a Spill Prevention Control and Countermeasures (SPCC) Plan reflective of the remedial activities planned for the Northern Area. The SPCC is included in the Final Phase IV as Appendix F.

The Following are Ms. Linda Segal's Comments:

1) Page 12, Section 2.4 Relevant Contacts. *The Town of Wayland owns parcel 23-052B on which the town's Wastewater Treatment Plant is located. I understand there are various town easements running through these parcels. Since DEP regulations (310 CMR 40.0874(3)(a) do not specifically require property owners to be listed as relevant contacts, it appears their inclusion on this list is discretionary and viewed as important and helpful. Applying the same*

logic, since the Town is a stakeholder (local residences, municipal buildings and local businesses including the existing office building on the subject property are connected or have allocated capacity to be connected to the treatment plant), it seems equally prudent and important to add the Town as a relevant contact. I respectfully suggest the following two parties be added to this list:

*Benson R. Gould, LSP, LEP (Town of Wayland's LSP)
CMG Environmental, Inc.
600 Charlton Street
South bridge, MA 01550
508-765-8510*

*Fred Turkington, Town Administrator, Wayland Town Building
41 Cochituate Rd.
Wayland, MA 01778
508-358-3620*

The remedial activities proposed in the Draft Phase IV will not occur on land or easements owned by the Town of Wayland. Therefore, these individuals will not be included in the contacts list for the Phase IV remedial actions. Raytheon and ERM will continue to be available to the public to answer any questions regarding the remedial action.

2) Page 13, Section 3.1.1 Impacted Areas - Soil. Please explain what is meant by the following: "Activities and uses specifically prohibited include...and subsurface activities and/or other activities that could render contaminated media accessible." The protective language at the end of that sentence creates a general umbrella to cover activities that Raytheon appears to be concerned enough to include. What are they?

This language was taken from the Deed Restriction placed on the property in 1997. In short, the Deed Restriction was completed to control the present and future use of the property. Any uses of the property not permitted in the Deed Restriction are subject to the approval of Raytheon and the LSP-of-record. There are no specific instances that this language is intended to cover.

3) Page 14, Section 3.1.2 Impacted Areas - Groundwater. Toluene was detected in field lab screening above the GW1 standard. While Raytheon believes toluene is not representative, nevertheless it was found there, which indicates that there may be issues besides chlorinated solvents in the Northern Area. The same can be said for the detection of chloroform. Based on comments made at public

meetings during this past year where the future redevelopment of the property has been discussed, major excavations and changes to the existing terrain and infrastructure seem possible. It is not clear if that will include installation of irrigation wells, drinking water wells, septic system, etc. So why is Raytheon not taking the most protective course by identifying and reporting toluene and chloroform as potential COCs (compounds of concern)?

As discussed in Section 3.1.2 of the Phase IV, toluene has not been detected above its RCGW-1 standard in groundwater samples collected from monitoring wells located in the Northern Area. The absence of additional groundwater monitoring data to support the detection of toluene above RCGW-1 leads ERM to conclude the detection of toluene above RCGW-1 is not representative of Site conditions and not considered reportable in accordance with 310 CMR 40.0317(14).

Chloroform was detected above its RCGW-1 concentration at MW-556S during groundwater sampling events in September and October 2005. Additional groundwater data did not confirm the detection of chloroform in groundwater at this well. The additional analytical data to support this conclusion is provided in Response III to Ben Gould's comments.

4) Pages 16-17, Section 3.2.2 Remedial Goals - Groundwater. *The performance standard for a permanent cleanup solution requires achieving background or making best efforts to approach background. In the wetlands portion of the cleanup, the effort was made to determine background for arsenic. Given the Northern Area also sits in our Zone II for the Baldwin Wellfield (drinking water), and to be most protective, why is Raytheon not including establishing background and including monitoring for toluene and chloroform?*

Raytheon and ERM have been and will continue to be protective of human health and the environment related to the releases identified at the Site. The toluene and chloroform detections were not reported to the Department in accordance with 310 CMR 40.0317(14), however, ERM continues to collect groundwater analytical data for these compounds to monitor for their presence.

5) Page 19, Section 4.2.2 Design & Construction - Cofferdam. *Please explain what utility lines will be affected by deactivation prior to construction. Will that affect any existing active utility connections and uses, such as to the Wastewater Treatment Plant or for emergency public safety response capabilities?*

Raytheon and ERM do not expect to locate any active utility lines in the area of the cofferdam construction as detailed in the Phase IV. However, to comply with Massachusetts Statute Chapter 82, Section 40, ERM will complete subsurface utility clearance activities prior to installing the cofferdam.

6) Page 20, Section 4.2.3 Design & Construction - Excavation & Staging/Dewatering. "The Wayland Conservation Commission will receive copies on all analytical data." I respectfully request that the Town's LSP, Ben Gould, also be copied at the same time on all analytical data.

In accordance with the revised Public Involvement Plan dated 13 July 2004 (PIP), Raytheon and ERM provide copies of all documentation and correspondence submitted to Mr. Ben Gould and the DEP.

7) Page 21, Section 4.2.3 Design & Construction - Excavation & Staging/Staging. Whenever Raytheon mentions the use of "new soil", it is not clear where the new soil will be coming from. Please specify your source for new soils to be used in the Northern Area. Please also specify the street routes Raytheon and its contractors expect to use for transporting what will apparently be a great deal of large equipment and soils. During the Q&A portion of the May 17 PIP, Ed Madera indicated that Raytheon expects the vehicles to use Route 20, a state roadway. To avoid negative impacts to Wayland's two nearby Historic Districts, designated scenic roads and residential neighborhoods, please amend your draft to include a traffic plan.

At this time, the source of clean fill has not been identified. However, the source of the fill will be analyzed to ensure that the soil meets applicable engineering and MCP requirements. Additionally, ERM has included a traffic plan in Section 4.2.5 of the Final Phase IV.

8) Page 25, Section 4.4.3 Implementation Program - Inspections & Monitoring. Please add notification of the anticipated work schedule to the Town's LSP (contact info already listed in item 1 above) so that he can decide if/when he wants to observe site work.

Raytheon and ERM are in the process of preparing a project schedule. This schedule will be provided to Ben Gould when it is available.

9) Page 26, Section 4.4.6 Implementation Program - Property Access. Should the owner of the Wastewater Treatment Plant be included in property access discussions? Should the Wastewater District Commission be invited to such

discussions since the Town owns that land parcel as described in item 1 above? If that opportunity has not been offered yet, please consider doing so, again, in the public interest. I also recall the public was invited on occasion to observe previous site work, e.g. wetlands project. Ed Madera indicated at the May 17 PIP meeting that he anticipates making such planned public site visits available again this fall. Is it appropriate to include mention of this in the RIP?

Because the remedial activities proposed in the Phase IV will not occur on land or easements owned by the Town of Wayland, it is not appropriate to include the Wastewater Treatment Plant in property access discussions. However, Raytheon and ERM will continue to be available to the public to answer any questions regarding the remedial action.

Site visits to observe the remedial construction activities will be coordinated separately and therefore will not be included in the Phase IV report. Raytheon will inform the public of public viewing times through Mr. Ben Gould and the PIP notification process.

10) Page 29, Section 5.3.1 Design & Implementation - Pre-Remedial Design Activities Raytheon refers to anticipated destruction of existing groundwater monitoring wells in the work zone during source area soil excavation. Please identify which specific wells are at risk. Will Raytheon replace those wells in the same exact locations as part of this RIP? I am assuming it is important to do so for the integrity of the data. What precautions will be taken to protect any and all existing wells on the property given that site activity will occur in many parts of the property?

Remedial activities are limited to the Northern Area and the parking lot. It is anticipated that the only monitoring wells to be impacted by the remedial activity are as follows:

- MW-262S/M/D; and
- MW-552.

All other Site monitoring wells within the construction zone will be flagged and contractors made aware of their presence to protect them. Should any of these wells be damaged or destroyed during the excavation activities, ERM will reinstall a monitoring well in the same location. The reinstalled monitoring well will meet the same design specifications as the monitoring well it is intended to replace.

11) Page 33, Section 6.0 Implementation Schedule Ed Madera indicated at the May 17 PIP meeting that he anticipates the next PIP meeting to occur this fall, perhaps in October, to report to the public the outcome of this soil excavation activity. Please amend your schedule to include mention of approximate months for future anticipated PIP meetings, at least through year 2007. That being said, I am mindful of the role Mother Nature plays in your proposed cleanup activities. Several years ago, your wetlands cleanup was complicated by bad weather, resulting in the need for an extension on your permit deadline. It is fortunate that Raytheon is planning this next step with more time flexibility, hoping that August will have dry enough conditions. Given some news media forecasts for increased incidence of hurricanes in the Northeast this year, what backup plan does Raytheon have for this implementation schedule in the event Mother Nature does not cooperate?

Raytheon schedules PIP meetings to inform the public of project activities, sampling events, remedial actions, and MCP deliverables. A PIP schedule for 2007 has not been completed. Raytheon will continue to inform the public of all PIP meetings through the PIP notification process.

Raytheon and ERM do not anticipate the weather to impact this project as it did during the wetland remediation 2 years ago, because the project is outside the wetland and flood plain of the Sudbury River.

May 17 PIP Meeting:

1) Transition to new Raytheon project manager: From my review of the cable TV rebroadcast, you did an excellent job with your first PIP presentation in Wayland, and it was an informative and productive meeting. Questions about how the cleanup relates to the future or ongoing legal negotiations (that are not public) are challenging and are not likely to go away. You and outgoing project manager Ed Madera made it clear how Raytheon views its focus and obligations with respect to the cleanup. Maintaining clear and open lines of communication among all stakeholders remains very important.

Thank you for your comment.

2) PowerPoint Slide 7: Request for a more clear historical synopsis: Thank you for your effort to be mindful of the "first-timers" who attended this meeting. Your PowerPoint slide number 7 showing only arsenic and MTBE in the wetlands and southern areas respectively may convey an incomplete picture, unfortunately, for those who are new to the hazmat issues. "First timers" either at the meeting or watching the cable TV rebroadcast are not likely to otherwise

know that your wetlands excavation reduced the presence of other contaminants (PCBs, PAHs, metals, etc.) and the southern area cleanup was prompted by a release in the office building courtyard. During the Q&A portion of the meeting, you broadened your explanations. Can you please consider adding an historical snapshot (two overlays should suffice, one for each of those site locations) in your PowerPoint presentation so the public can appreciate the scope of the cleanup work already completed since this became a PIP site?

Thank you for your input. As you are aware, Raytheon developed the extranet as a tool to update the public on environmental actions at the Site. The extranet contains updates to all existing Release Tracking Numbers (RTNs) at the Site. Due to time constraints of PIP presentations, Raytheon is unable to provide status updates for all RTNs during a PIP meeting. However, Raytheon and ERM will continue to be available for questions after PIP meetings.

3) PowerPoint Slides 9, 16 & 17: Request for more detail: Questions from the public indicated that everyone would benefit from a bit more information on these slides. Slide 9 (the angled boundary line) would be less confusing if Raytheon identified who owns each parcel (the Draft IV RIP report does list such information elsewhere) so the public can better appreciate the relationships amongst the stakeholders, including identifying the location of the Town's Wastewater Treatment Plant. And on Slides 16 & 17, it would be more informative if the groundwater divide and flow lines on the eastern portion of the property (not all groundwater flows and discharges westerly towards the Sudbury River) were shown. I respectfully suggest that information be added to future PowerPoint presentations.

Thank you for your input; we will take that into consideration in preparation for the next PIP meeting. The handouts provided at the PIP meeting were intended to supplement the information provided in the Phase IV report. The public is recommended to review the Phase IV, if the public requests any information that is not provided in the report, we request that those requests come through the PIP process.

The groundwater potentiometric surface maps provided in the presentation and the Phase IV present the groundwater gauging data for the Site where monitoring wells are located. Raytheon and ERM can not include groundwater gauging information for the eastern portion of the site, as there are no monitoring wells in that area.

4) Q&A

An overriding concern implicit and explicit in many of the questions asked by the public, including town officials, is the need and interest to understand how Raytheon's planned cleanup site activities will be well-coordinated and integrated with proposed plans to redevelop the property. The new zoning district recently approved at town meeting calls for replacing the existing structures with residential housing and retail stores. To underscore that ongoing and pressing need for clear information and open communication, please be aware that as recently as two nights ago, at a Planning Board meeting with the developers' team, the Planning Board expressed concern about the deed restrictions as a possible factor in the Town pursuing ownership of a 2-acre Town Green yet to be designated. That is separate from the municipal pad for which a lease agreement is anticipated. While town ownership of the green might help avoid future first amendment rights conflicts, the project manager postponed detailed discussion about the deed restrictions, liability and other environmental concerns such ownership may raise.

Last year, on June 27, 2005, Raytheon and Ben Gould met with the Wayland Selectmen to provide an update about the cleanup. At that time, the terms of the existing deed restrictions and AUL were explained and "memorialized" in a letter. It will be very important for the Town to be informed about the terms of whatever new agreement Raytheon negotiates regarding lifting the existing restrictions and imposing new ones.

Another unknown is what contaminants, if any, lie under the existing structures on the property in soils and groundwater. Monitoring the status of remediation activities in the identified "southern area" involves the existing office building. While Raytheon responded to several variations of this question at the PIP meeting, it would be helpful if the citations for the specific MCP and Brownfields regulations and "standard of care" required by site owners can be identified. How they are followed, reported and overseen will be very important for what has been a complex PIP site in this environmentally sensitive location.

As redevelopment of the property moves forward, what plan/protocol will Raytheon create to protect its investment, interests and the public welfare? You have spent many years and many dollars on this project since it became a PIP site in year 2000. There is public confidence in your proven track record, but this property has changed ownership several times in recent years and could do so again tomorrow.

Will Raytheon post on its website and add to the repositories any and all reports, correspondence related to your oversight of environmental issues on the property (within your jurisdiction), and legal agreements with are affected or generated

by redevelopment activities? One example mentioned at the pip meeting was the need for the developer to prove (to whom?) a soil management plan. What protocol is there for such plans? Does it include testing? If so, where do those data get reported?

Another question asked at the PIP meeting was about the possible need to move the existing outfall pipe. There has been some creative and innovative thinking about septic solutions that could possibly involve relocating the Wastewater Treatment Plant. And there has been mention by the Selectmen about a canoe launch along the Sudbury River. What will Raytheon's protocol be to respond to?

As you know from our communication today, it would be helpful if Raytheon would please clarify exactly how it prefers written public comment to be submitted. If email alone is not considered adequate, please explain

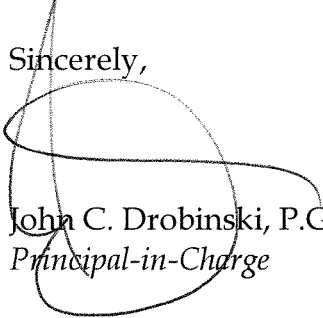
Thank you for these comments. Raytheon will continue to communicate with the Town of Wayland and public through the PIP meetings and the extranet site. Raytheon has been and will continue to be responsive to the Town's requests for meetings to discuss issues associated with environmental conditions at the Former Raytheon Facility. However, questions regarding redevelopment activities should be addressed to the property owner/redeveloper.

As appropriate, Raytheon and John Drobinski, LSP-of-record, will review plans and provide input to the property developer. Any public documents prepared by Raytheon regarding the Site will be posted on the extranet and provided to Ben Gould.

Please provide all future written comments, with an original signature, to the attention of Chip Burkhardt, Raytheon Company.

If you have any questions or comments please, contact Mr. Chip Burkhardt of Raytheon at (978) 436-8238.

Sincerely,



John C. Drobinski, P.G., LSP
Principal-in-Charge



for Rachel B. Leary
Project Manager

cc: Mr. Chip Burkhardt, Raytheon Company, Billerica, MA 01821
Mr. Ronald Slager, Raytheon Company, Billerica, MA 01821
Public Repository, Wayland Public Library, Wayland, MA 01778
Public Repository, Board of Health Office, Wayland, MA 01778
Mr. Ben Gould, CMG Environmental, Southbridge, MA 01550
Ms. Linda Segal, Wayland, MA 01778